

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC.,
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,
OPENAI OPCO LLC, OPENAI GLOBAL LLC,
OAI CORPORATION, LLC, and OPENAI
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:23-cv-11195

**MOTION FOR ADMISSION OF
ATTORNEY PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States District Court for the Southern District of New York, I, Davida Brook, hereby move this Court for an Order for admission to practice Pro Hac Vice to appear as counsel for Plaintiff The New York Times Company in the above-captioned action.

I am an active member in good standing of the California State Bar. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3, as well as a certificate of good standing from the California State Bar.

Dated: January 4, 2024

/s/ Davida Brook

Davida Brook (*pro hac vice*)
SUSMAN GODFREY L.L.P.
1900 Ave of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150
dbrook@susmangodfrey.com

*Attorneys for Plaintiff
The New York Times Company*